

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Comments on Givaudan Flavors Corporation Draft Conditional Major Air Quality Permit submitted by Field Office after discussion with Kevin Rotsching, EH & S Manager.

Conditional major Permit

1. Page 2, Unit 01 (P01)/Description and Specific Control Equipment tables – Delete RTO pre-filter as control method C02 to control PM₁₀. Even though a prefilter is present on the RTO and it may capture PM₁₀, this capture efficiency is not used for emission estimates. It is the scrubber/demister that is used for PM control.

Division's response: The Division concurs with the comment and has revised the permit descriptions for Unit 01 as suggested by the source.

2. Page 2, Unit 01 (P01)/Description – Delete word 'new' in the table for specific control equipment. The filter mat spray/belt dryer was new at the last permit revision.

Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.

3. Page 4 Specific Monitoring Requirements: 4a should read "Water flow rate readings in gallons per minute (gals/minute) and pressure drop in inches of water (in H₂O) for the following control devices taken once daily and recorded when affected equipment is in operation", in order to establish a frequency and method of monitoring of each control device performance.

Division's response: The Division concurs with the comment and has revised the permit as suggested.

4. Pages 4, 7 and 11 Specific Recordkeeping Requirements: "A record of respective pressure drops shall be maintained" does not specify the frequency of measurement nor does it specify the device for which the measurements are being made.

Division's response: The Division concurs with the comment and has revised the permit to read as "A daily record of respective pressure drops shall be maintained for each control device listed in 4.a. above" on pages 4 and 7 and to read as "A daily record of the pressure drops shall be maintained for the control device" on page 11.

4. Page 11 Specific Monitoring Requirements: There is no reference to the recordkeeping requirement for the control device.

Division's response: The Division concurs with the comment and has revised the permit to read as "Refer to 5. Specific Recordkeeping Requirements for documentation of monitoring from the control device."

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.